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16 ALBERTSONS COMPANIES, INC, and  
17 SAFEWAY INC.

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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

19 CALEB HALEY, individually and on behalf  
20 of all others similarly situated,

21 Plaintiff,

22 v.

23 ALBERTSONS COMPANIES, INC., a  
24 foreign corporation, and SAFEWAY INC., a  
25 domestic corporation,

26 Defendants.

Case No. 1:23-cv-02811-TLT

**JOINT STIPULATION AND [PROPOSED] ORDER TO EXTEND TIME TO RESPOND TO COMPLAINT AND BRIEFING SCHEDULE AS MODIFIED**

Complaint Filed: June 7, 2023

21 Pursuant to Civil Local Rule 6-1, Defendants Albertsons Companies, Inc., and Safeway Inc.,  
22 (“Defendants”) and Plaintiff Caleb Haley (“Plaintiff”) stipulate as follows:

23 WHEREAS, Plaintiff filed his Complaint on June 7, 2023;

24 WHEREAS, Defendants were served with the Summons and Complaint on June 12, 2023;

25 WHEREAS, Defendants currently have until July 5, 2023 to respond to the Complaint;

26 WHEREAS, Winston & Strawn LLP was recently retained in this matter and will need time  
27 to adequately investigate and respond to the claims asserted in this matter;

1 WHEREAS, Defendants have requested, and Plaintiff has consented to, additional time  
 2 through and including July 28, 2023, to respond to Plaintiff's Complaint;

3 WHEREAS, the parties have agreed to the following briefing schedule with respect to  
 4 Defendants' response to the Complaint:

Date	Pleading
July 28, 2023	Defendants' response to Complaint
August 28, 2023	Plaintiff's Opposition Deadline
September 18, 2023	Defendants' Reply Deadline

10 WHEREAS, there have been no prior time modifications in this case; and

11 WHEREAS, extending the foregoing deadlines will not impact any other deadlines in this case.

12 THEREFORE, IT IS HEREBY STIPULATED by and between the Parties that Defendants  
 13 shall answer or otherwise respond to Plaintiff's Complaint by July 28, 2023, Plaintiff's deadline to  
 14 file any opposition brief is August 28, 2023, and Defendants' deadline to file any reply brief is  
 15 September 18, 2023.

17 Dated: June 28, 2023

**WINSTON & STRAWN LLP**

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23 PURSUANT TO STIPULATION, IT IS SO ORDERED. **Motion hearing set for 10/17/2023 at 2 PM.**  
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25 Dated: June 30, 2023  
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The Honorable Trina L. Thompson  
United States Judge